

## REMARKS

This application has been carefully reviewed in light of the final Office Action dated June 5, 2007. Claims 1, 4 to 7, 9 to 12 and 14 to 16 are pending in the application. Claims 1 and 12 are independent. Reconsideration and further examination are respectfully requested.

Claims 1, 4 to 7, 9 to 12 and 14 to 16 were rejected under 35 U.S.C. § 112, first paragraph. Specifically, the Office Action alleges that the expressions “judging whether or not a recording operation is complete” and “wherein said judging means is arranged inside the storage unit” lack support in the specification. The rejections are respectfully traversed.

In particular, in one example embodiment of the present invention described with reference to Figure 3, the specification discloses “the control circuit 10 waits for the end of various operations which should be executed before the removable hard disk cartridge 1 is ejected.” (page 11, lines 13 to 16 of the specification; see also, Figure 3, element S103). In this regard, Applicants note that control circuit 10 is arranged inside hard disk cartridge 1 in this example embodiment. (See, Figure 1).

Accordingly, reconsideration and withdrawal of the rejections are respectfully requested.

Claims 1, 4 to 7, 9 to 12, 14 and 15 were rejected under 35 U.S.C. § 103(a) over U.S. Patent Application Publication No. 2002/0032839 (Yamamoto) and U.S. Patent Application Publication No. 2004/0037174 (Uchida). Reconsideration and withdrawal of the rejections are respectfully requested.

The present invention generally concerns a storage unit which is detachable from an information processing apparatus having ejecting means for ejecting the storage unit, the storage unit having a storage medium for storing data from the information processing apparatus. Storage of data into the storage medium is controlled. An eject instruction to eject the storage unit from the information processing apparatus is received by the storage unit. A judgment is made by the storage unit as to whether or not an operation which should be complete in the storage unit before the storage unit is ejected is complete. An eject permission signal is output from the storage unit to the information processing apparatus for ejecting the storage unit by the ejecting means if it is judged that the operation in the storage unit is complete.

Thus, among its many features, the present invention provides for judging, by a storage unit, whether or not an operation which should be complete in the storage unit before the storage unit is ejected is complete.

Referring specifically to the claims, independent Claims 1 and 12 are respectively directed to a storage unit and a method.

The applied references are not seen to disclose or to suggest the features of the invention of the subject application. In particular, Yamamoto and Uchida are not seen to disclose or suggest at least the feature of judging, by a storage unit, whether or not an operation which should be complete in the storage unit before the storage unit is ejected is complete.

In entering the rejection of Claims 1 and 12, the Office Action asserts that the abstract and paragraphs [0017] and [0018] of Yamamoto disclose judging, by a storage unit, whether or not a recording operation in the storage unit is complete. Specifically, in

responding to prior arguments in support of patentability, the Office Action asserts that “what determines whether or not the recording operation is complete in one embodiment [of Yamamoto] is ‘a cache storage that is controlled in such a manner that it is also held in the storage medium, it is constructed so that when the indication of ejection of the storage medium is given from a user to the memory device, a write processing for the storage medium is performed in the case where information to be recorded in the storage medium exists in the cache storage’. The judging of whether the recording operation is complete depends on whether information to be recorded in the storage medium exists in the cache.” (Office Action, page 3)(emphasis added). Thus, the Office Action appears to be asserting that Yamamoto’s cache storage judges whether or not a recording operation in the storage unit is complete. Applicants respectfully disagree.

Contrary to the Office Action’s assertion, Yamamoto is seen to disclose “[a] cache is constituted in an HDD or DVD-RAM under the control of a Web cache program. . . and the control [by the Web cache program] is made so that the writing of the cache contents and necessary entries of the management table is completed before the DVD-RAM is removed from the browser apparatus.” (abstract of Yamamoto)(emphasis added). Even the portion of Yamamoto cited by the Office Action discloses that the “cache storage is controlled”. Thus, even if Yamamoto could be viewed as disclosing “[t]he judging of whether the recording operation is complete depends on whether information to be recorded in the storage medium exists in the cache”<sup>1</sup>, Applicants submit that Yamamoto’s

---

<sup>1</sup>Applicants do not concede this point.

cache cannot reasonably be viewed as judging, by a storage unit, whether or not a recording operation in the storage unit is complete.

On the other hand, Yamamoto's Web cache program is also not seen to disclose or to suggest judging, by a storage unit, whether or not a recording operation in the storage unit is complete.

Nor is Yamamoto seen to disclose or to suggest the currently-amended feature of judging, by a storage unit, whether or not an operation which should be complete in the storage unit before the storage unit is ejected is complete.

Uchida has been reviewed and is not seen to compensate for the deficiencies of Yamamoto. In particular, Uchida is seen to disclose a disk drive device in which a disk ejection mechanism comprises authentication control means that outputs a disk ejection instruction to a mechanism control, if a disk ejection instruction and authentication information are input. (See, e.g., Uchida, Figures 1 and 6; and paragraphs 8 and 11).

However, Uchida is not seen to disclose or suggest judging, by a storage unit, whether or not an operation which should be complete in the storage unit before the storage unit is ejected is complete.

Accordingly, independent Claims 1 and 12 are believed to be allowable.

The other claims in the application are each dependent from the independent claims and are believed to be allowable over the applied references for at least the same reasons. Because each dependent claim is deemed to define an additional aspect of the invention, however, the individual consideration of each on its own merits is respectfully requested.

No other matters being raised, it is believed that the entire application is fully in condition for allowance, and such action is courteously solicited.

Applicants' undersigned attorney may be reached in our Costa Mesa, California office at (714) 540-8700. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

/Gregory S. Weaver, #53,751/

Gregory S. Weaver  
Attorney for Applicants

FITZPATRICK, CELLA, HARPER & SCINTO  
30 Rockefeller Plaza  
New York, New York 10112-3800  
Facsimile: (212) 218-2200

FCHS\_WS 1550234v1